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*Attorneys for the United States of America*

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA, )  
Plaintiff, ) Case No. 22-cv-1130  
v. ) ) **COMPLAINT**  
GLEN A. STOLL; STOLL FAMILY TRUST; )  
DIRECTOR OF THE FAMILY DEFENSE )  
LEAGUE a.k.a. FAMILY DEFENSE )  
LEAGUE a.k.a. FAMILY DEFENSE )  
NETWORK a.k.a. FAMILY DEFENSE )  
FUND; and SNOHOMISH COUNTY, )  
Defendants. )

The United States of America (“United States”), by and through its undersigned counsel, hereby alleges as follows:

## INTRODUCTION

1. This is a civil action timely brought by the United States of America (“United States”) to: (i) reduce to judgment the outstanding federal tax assessments against Glen A. Stoll; (ii) find a parcel of improved property located in Snohomish County, Washington, described

1 more completely below and referred to as the “Subject Property”, is held by a nominee and/or  
 2 alter ego of Defendant Glen A. Stoll; (iii) foreclose federal tax liens on the Subject Property,  
 3 selling it and distributing the proceeds of such sale in accordance with the Court’s findings as to  
 4 the validity and priority of the liens and claims of all the parties as to the Subject Property.

5 **JURISDICTION AND VENUE**

6       2. This action is commenced pursuant to 26 U.S.C. §§ 7401 and 7403 at the  
 7 direction of the Attorney General of the United States and with the authorization and request of  
 8 the Chief Counsel of the Internal Revenue Service (“IRS”), a delegate of the Secretary of the  
 9 Treasury of the United States.

10      3. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1340 and  
 11 1345, and 26 U.S.C. §§ 7402 and 7403.

12      4. Venue properly lies in this judicial district pursuant to 28 U.S.C. §§ 1391(b) and  
 13 1396 because Glen A. Stoll resides in this judicial district, the federal tax liabilities at issue  
 14 accrued within this judicial district, and the Subject Property is located within this judicial  
 15 district.

16      5. Because Glen A. Stoll resides in Snohomish County and the Subject Property is  
 17 located in Snohomish County, pursuant to LCR 3(d), this action should be assigned to the Court  
 18 in Seattle.

19 **DEFENDANTS**

20      6. Glen A. Stoll resides at the Subject Property located in this judicial district and is  
 21 named as a defendant because he has unpaid federal tax liabilities and has an ownership interest  
 22 in the Subject Property.

23      7. The Stoll Family Trust is named as a defendant pursuant to 26 U.S.C. § 7403(b)  
 24 because it may claim an interest in the Subject Property.

25      8. The Director of the Family Defense League a.k.a. Family Defense League a.k.a.  
 26 Family Defense Network a.k.a. Family Defense Fund is named as a defendant pursuant to 26  
 27 U.S.C. § 7403(b) because it may claim an interest in the Subject Property.

9. The Director of the Family Defense League is registered with the Washington State Secretary of State as an active business with a UBI 602 092 549. It is listed as a corporation sole. Glen Stoll is listed as the Governor.

10. Snohomish County is named as a defendant pursuant to 26 U.S.C. § 7403(b) because it may claim an interest in the Subject Property.

## **SUBJECT PROPERTY**

11. The real property at issue in this action consists of a parcel of real property commonly described as 7311 Grove St. SE, Marysville, WA 98270 (“Subject Property”).

12. The Subject Property bears Snohomish County Assessor's Parcel Number 7753-000-007-00.

13. The legal description of the Subject Property is as follows:

LOT(S) 7, MUNSON CREEK ESTATES DIVISION III, ACCORDING TO THE PLAT  
THEREOF RECORDED IN VOLUME 49 OF PLATS, PAGE(S) 180 AND 181,  
RECORDS OF SNOHOMISH COUNTY, WASHINGTON

14. On or about May 21, 2002, "Richard H. Stoll and Mary Stoll Family Trust," acquired the Subject Property by Statutory Warranty Deed from Joseph S. Walters and Blanche F. Walters.

15. The consideration stated on the Statutory Warranty Deed referred to in paragraph 14, above, is “ten dollars and other good and valuable consideration.” Public Snohomish County property tax records [<https://perma.cc/7H6R-K7PK>] show that the actual sale amount was for \$195,000.

16. The Statutory Warranty Deed referred to in paragraph 14, above, was recorded with the Snohomish County Auditor on May 23, 2002 (Instrument No. 200205230886).

17. On or about May 16, 2002, "Richard H Stoll and Mary Stoll, Family Trust" granted a Deed of Trust with respect to the Subject Property to Credit Union of the Pacific in the amount of \$185,250.00.

18. The Deed of Trust referred to in paragraph 17, above, was recorded with the Snohomish County Auditor on May 23, 2002 (Instrument No. 200205230887).

1       19. On or about August 31, 2005, “Richard H. Stoll and Mary Stoll, a marital  
 2 community,” purported to transfer the Subject Property to “Richard H. Stoll and Mary Stoll, as  
 3 Cotrustees of the Stoll Family Trust, under Agreement dated (UAD) the 31st day of January,  
 4 1992” by Quit Claim Deed.

5       20. The consideration stated on the Quit Claim Deed referred to in paragraph 19,  
 6 above, is “love and affection.” Public records show this transfer’s sale amount being \$0. *See*  
 7 [<https://perma.cc/7H6R-K7PK>].

8       21. The Quit Claim Deed referred to in paragraph 19, above, was recorded with the  
 9 Snohomish County Auditor on October 4, 2005 (Instrument No. 200510040427).

10      22. On or about September 13, 2005, Richard and Mary Stoll executed a Restatement  
 11 of the Richard H. Stoll and Mary Stoll Family Trust Agreement referred to in paragraph 19,  
 12 above.

13      23. Article VII of the Restatement of Stoll Family Trust Agreement entitled  
 14 “Distribution of Trust” states “[a]ny interest the Trust may have in the property known as 7311  
 15 Grove St., Marysville, Washington, is to be assigned to the portion allocated for **Glen A. Stoll**.<sup>1</sup>

16      24. Richard H. Stoll died on February 25, 2006.

17      25. Mary Stoll died on October 29, 2011.

18      26. On or about November 28, 2012, Credit Union of the Pacific gave “Richard H  
 19 Stoll and Mary Stoll” a Full Reconveyance of the Subject Property.

20      27. The Full Reconveyance referred to in paragraph 26, above, was recorded with the  
 21 Snohomish County Auditor on December 4, 2012 (Instrument No. 201212040264).

## 22                   FEDERAL TAX LIABILITIES AND LIENS

23      28. The United States incorporates by reference paragraphs 1 through 27, above, as if  
 24 fully set forth here.

25      29. Glen A. Stoll has not voluntarily filed income tax returns since 1988. He  
 26 previously held himself out as a lawyer, though the government has found no records showing  
 27 that he went to any law school or has been admitted to any bar. *See United States v. Stoll*, Case

1 No. 05-cv-0262-RSM, 2005 WL 1763617 at \*7 (June 27, 2005) (“Stoll falsely hold [sic] himself  
 2 out to be a ‘lawyer’ and claims to have spent considerable time studying the tax laws. He is not a  
 3 member of or licensed with any state or federal bar.”). Glen A. Stoll made money selling  
 4 fraudulent tax avoidance schemes to others, using corporations sole and ministerial trusts. *See*  
 5 *United States v. Stoll*, 2005 WL 1763617 at \*1 (stating that Glen Stoll and his entities “organize,  
 6 promote, and market a fraudulent tax scheme using corporations sole and ministerial trusts in an  
 7 attempt to fraudulently evade income and employment tax”).

8       30.     The IRS calculated Glen A. Stoll’s income tax liabilities under 26 U.S.C. §  
 9 6020(b) for tax years 2001 through 2008.

10      31.     On or about March 6, 2012, the IRS sent a Statutory Notice of Deficiency to Glen  
 11 A. Stoll computing his tax liabilities for tax years 2001 through 2008. The Statutory Notice of  
 12 Deficiency also asserted additions to tax under 26 U.S.C. § 6651(a)(1) (penalty for failure to file  
 13 tax return), 26 U.S.C. § 6651(a)(2) (penalty for failure to pay tax), and 26 U.S.C. § 6654(a)  
 14 (penalty for failure to pay estimated tax liability). Glen A. Stoll did not petition the U.S. Tax  
 15 Court to contest the Statutory Notice of Deficiency and the time has expired to do so. 26 U.S.C.  
 16 § 6213(a).

17      32.     On the dates and for the amounts listed in the chart below, a duly authorized  
 18 delegate of the Secretary of the Treasury made timely assessments against Glen A. Stoll for  
 19 unpaid federal income taxes (Form 1040: U.S. Individual Income Tax Return), penalties,  
 20 interest, and other statutory additions for the taxable periods set forth below:

Tax Period and Type	Assessment Date	Amount and Type of Assessment <sup>1</sup>	Unpaid Balance <sup>2</sup> (as of July 31, 2022)
12/31/2001	08/27/2012	Tax	\$ 9,651.00
	08/27/2012	Estimated Tax Penalty	\$ 385.70

25  
 26 <sup>1</sup> Failure to Pay Tax Penalty and Failure to File Penalty under 26 U.S.C. § 6651. Estimated Tax  
 Penalty under 26 U.S.C. § 6654.

27 <sup>2</sup> Including penalties, statutory accruals, and adjustments or abatements.

1	(Form 1040)	08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest Interest	\$ 2,171.48 \$ 2,412.75 \$ 8,615.54 \$ 622.49 \$ 2,664.54 \$ 1,087.21 \$ 1,312.37 \$ 1,648.81 \$ 1,355.37	
2	12/31/2002 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest	\$ 43,819.00 \$ 1,464.27 \$ 9,859.28 \$ 10,954.75 \$ 33,965.93 \$ 2,680.59 \$ 11,431.66 \$ 4,644.39 \$ 5,579.37 \$ 7,009.66 \$ 5,762.15	\$ 145,137.08
3	12/31/2003 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest	\$ 49,194.00 \$ 1,269.29 \$ 11,068.65 \$ 12,298.50 \$ 33,794.46 \$ 2,883.15 \$ 12,295.52 \$ 4,995.36 \$ 6,001.00 \$ 7,539.38 \$ 6,197.59	\$ 156,104.91
4	12/31/2004 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest	\$ 76,643.00 \$ 2,196.38 \$ 17,244.68 \$ 19,160.75 \$ 45,811.62 \$ 4,314.53 \$ 18,399.77 \$ 7,475.35 \$ 8,980.26 \$ 11,282.36 \$ 9,274.45	\$ 233,604.83
5	12/31/2005 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest	\$ 41,708.00 \$ 1,672.99 \$ 9,384.30 \$ 10,427.00 \$ 20,117.85 \$ 2,231.79 \$ 9,517.71 \$ 3,866.81 \$ 4,645.24 \$ 5,836.07 \$ 4,797.41	\$ 120,837.48

1	12/31/2006 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016 11/06/2017 11/05/2018 11/04/2019 11/02/2020	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest Interest Interest Interest Interest	\$ 89,763.00 \$ 4,247.92 \$ 20,196.68 \$ 22,440.75 \$ 31,810.30 \$ 4,512.82 \$ 19,245.42 \$ 7,818.93 \$ 9,393.00 \$ 11,800.92 \$ 9,700.70	\$ 244,341.41
2	12/31/2007 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 11/07/2016	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Interest	\$ 35,804.00 \$ 1,629.54 \$ 8,055.90 \$ 8,951.00 \$ 8,505.75 \$ 1,686.26 \$ 7,191.24	\$ 91,300.52
3	12/31/2008 (Form 1040)	08/27/2012 08/27/2012 08/27/2012 08/27/2012 08/27/2012 07/15/2013 07/15/2013 11/07/2016	Tax Estimated Tax Penalty Failure to File Penalty Failure to Pay Tax Penalty Interest Interest Failure to Pay Tax Penalty Interest	\$ 16,329.00 \$ 524.77 \$ 3,674.03 \$ 3,347.44 \$ 2,621.99 \$ 709.83 \$ 734.81 \$ 3,108.92	\$ 39,471.01
4				<b>TOTAL</b>	<b>\$1,065,441.22</b>

14           33. Timely notice stating the amounts and demanding payments of the assessments  
 15 set forth in paragraph 32, above, was provided to and made upon Glen A. Stoll, as required by 26  
 16 U.S.C. § 6303.

17           34. Despite timely notice and demand for payment of the assessments described in  
 18 paragraph 32, above, Glen A. Stoll has neglected, failed, and/or refused to make full payment of  
 19 the assessed amounts to the United States.

20           35. As of July 31, 2022, Glen A. Stoll owes the United States \$1,065,441.22 for  
 21 unpaid federal income taxes for the assessments described in paragraph 32, above. Additional  
 22 unassessed interest and other statutory additions as provided by law will accrue on this balance.

23           36. Pursuant to 26 U.S.C. §§ 6321 and 6322, liens arose in favor of the United States  
 24 on the dates of the assessments set forth in paragraph 32, above, and attached to all property and  
 25 rights to property of Glen A. Stoll, including the Subject Property.

26           37. In order to provide notice to third parties entitled to notice of the statutory liens

1 under 26 U.S.C. § 6323, the IRS recorded the following Notices of Federal Tax Lien (“NFTL”)  
 2 with the Snohomish County Auditor:

Taxpayer	Type of Tax	Tax Period(s)	Notice	Recording Date	Recording No.
Glen A. Stoll	1040 (Income)	12/31/2001 12/31/2002 12/31/2003 12/31/2004 12/31/2005 12/31/2006 12/31/2007 12/31/2008	NFTL	04/22/2015	201504220339
Stoll Family Trust Janet Spangler Trustee as Nominee of Glen A. Stoll <sup>3</sup>	1040 (Income)	12/31/2001 12/31/2002 12/31/2003 12/31/2004 12/31/2005 12/31/2006 12/31/2007 12/31/2008	NFTL	09/13/2017	201709130089

**FIRST CLAIM FOR RELIEF: TO REDUCE FEDERAL TAX ASSESSMENTS AGAINST DEFENDANT GLEN A. STOLL TO JUDGMENT**

38. The United States incorporates by reference paragraphs 1 through 37, above, as if fully set forth here.

39. Under 26 U.S.C. § 7402(a), the United States has established a claim against Glen A. Stoll in the amount of \$1,065,441.22 for unpaid federal income taxes for the assessments for the 2001, 2002, 2003, 2004, 2005, 2006, 2007, and 2008 individual income tax periods, above, as of July 31, 2022, plus statutory interest which continues to accrue as provided by 28 U.S.C. § 1961(c)(1) and 26 U.S.C. §§ 6601, 6621, and 6622 and other statutory additions as provided by law, less any subsequent payment or credits until paid in full.

**SECOND CLAIM FOR RELIEF: TO DETERMINE THAT GLEN A. STOLL IS THE TRUE OWNER OF THE SUBJECT PROPERTY**

40. The United States incorporates by reference paragraphs 1 through 39, above, as if

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<sup>3</sup> NFTL concerning the Subject Property.

1 fully set forth here.

2       41. As described above, Article VII of the Restatement of Stoll Family Trust  
3 Agreement entitled “Distribution of Trust” states “[a]ny interest the Trust may have in the  
4 property known as 7311 Grove St., Marysville, Washington, is to be assigned to the portion  
5 allocated for **Glen A. Stoll.**”

6       42. Following the death of his parents, Richard H. Stoll and Mary Stoll, Glen A. Stoll  
7 became the owner of the Subject Property.

8       43. The Stoll Family Trust exists for the purpose of holding title to the Subject  
9 Property.

10      44. The Stoll Family Trust is used as a mere shell to shield Glen A. Stoll’s assets  
11 from tax collection.

12      45. Glen A. Stoll resides at the Subject Property and enjoys the use and benefits of the  
13 Subject Property. Glen A. Stoll has paid no rent to the Stoll Family Trust for continued use of the  
14 Subject Property.

15      46. Glen A. Stoll makes all decisions with respect to the Subject Property.

16      47. Payment of utilities and property taxes is made from the bank accounts of The  
17 Director of the Family Defense League a.k.a. Family Defense League a.k.a. Family Defense  
18 Network a.k.a. Family Defense Fund, an entity controlled by Glen A. Stoll.

19      48. Glen A. Stoll is the sole signatory on the bank account of The Director of the  
20 Family Defense League a.k.a. Family Defense League a.k.a. Family Defense Network a.k.a.  
21 Family Defense Fund.

22      49. The Director of the Family Defense League a.k.a. Family Defense League a.k.a.  
23 Family Defense Network a.k.a. Family Defense Fund, is an entity inseparable from Glen A. Stoll  
24 and has no interest in the Subject Property.

25      50. The Stoll Family Trust and/or the Family Defense League are sham entities,  
26 controlled entirely by Glen Stoll. Glen Stoll has disregarded the “separate entity” of those  
27 entities through his actions by using the Subject Property as his personal residence, free of

1 charge, and paying his personal expenses out of the Family Defense League's accounts. Glen A.  
 2 Stoll so dominates and controls both the Stoll Family Trust and the Family Defense League that  
 3 those two entities are his alter egos.

4       51. Given the lack of consideration paid by the Stoll Family Trust, the close  
 5 relationship between Glen A. Stoll and the Stoll Family Trust, and the fact that Glen A. Stoll  
 6 continues to live at the property rent free, enjoying all benefits of ownership, the Stoll Family  
 7 Trust owns the Subject Property as Glen A. Stoll's nominee.

8       52. Based on the foregoing, and because Glen A. Stoll maintained a beneficial interest  
 9 in and control over the Subject Property, to the extent that the Stoll Family Trust and/or the  
 10 Family Defense League hold title to the Subject Property, they do so as the nominees and/or alter  
 11 egos of Glen A. Stoll.

12       53. Any claim to or interest in the Subject Property by the Stoll Family Trust and/or  
 13 the Family Defense League is non-existent. Any such claim or interest was part of a scheme to  
 14 defraud creditors of Glen A. Stoll, including the United States, and have no merit.

15       54. Glen A. Stoll is the true owner of the Subject Property.

**THIRD CLAIM FOR RELIEF: TO FORECLOSE FEDERAL TAX LIENS THAT  
 ENCUMBER THE SUBJECT PROPERTY**

16       55. The United States incorporates by reference paragraphs 1 through 54, above, as if  
 17 fully set forth here.

18       56. The Subject Property and all fixtures thereon are encumbered with federal tax  
 19 liens for the unpaid federal tax assessments described in paragraph 32, above.

20       57. The federal tax liens arising from the assessments described in paragraph 32,  
 21 above have priority over all interests in the Subject Property acquired after the attachment of the  
 22 federal tax liens, subject to the provisions of 26 U.S.C. § 6323.

23       58. The United States seeks to foreclose the federal tax liens through the sale of the  
 24 Subject Property on the basis that the Stoll Family Trust and Family Defense League are the  
 25 nominee and/or alter ego of Glen A. Stoll.

1       59.     Federal tax liens arising from the assessments against Glen A. Stoll continue to  
 2 attach to the Subject Property.

3       60.     Under 26 U.S.C. § 7403(c), the United States is entitled to a decree of sale of the  
 4 Subject Property to enforce its federal tax liens.

5           WHEREFORE, the Plaintiff, the United States prays as follows:

6       A.     That this Court determine, adjudge, and decree that Defendant Glen A. Stoll is  
 7 indebted to the United States for unpaid federal income tax liabilities for tax years 2001 through  
 8 2008, described in paragraph 32, above, in the amount of \$1,065,441.22 as of July 31, 2022, plus  
 9 statutory interest which continues to accrue as provided by 28 U.S.C. § 1961(c)(1) and 26 U.S.C.  
 10 §§ 6601, 6621, and 6622 and other statutory additions as provided by law, less any subsequent  
 11 payment or credits until paid in full, and that judgment in that amount be entered against  
 12 Defendant Glen A. Stoll and in favor of the United States;

13       B.     That this Court determine, adjudge, and decree that the United States has valid  
 14 and subsisting federal tax liens against all property and rights to property of Defendant Glen A.  
 15 Stoll, including but not limited to, their interest in the Subject Property;

16       C.     That the Court determine, adjudge, and decree that Defendants the Stoll Family  
 17 Trust and Family Defense League are the nominees and/or alter ego of Glen A. Stoll.

18       D.     That this Court determine, adjudge, and decree that any claim to or interest in the  
 19 Subject Property by Defendants the Stoll Family Trust and Family Defense League are non-  
 20 existent.

21       E.     That this Court determine the interest, if any, of the other named defendants in the  
 22 Subject Property and their respective priority to a distribution of proceeds from a sale of the  
 23 Subject Property;

24       F.     That this Court foreclose the federal tax liens and judgment liens against  
 25 Defendant Glen A. Stoll encumbering the Subject Property;

26       G.     That this Court order the Subject Property be sold with proceeds applied to Glen  
 27 A. Stoll's delinquent unpaid federal income tax liabilities for tax years 2001 through 2008; and

1 H. That the United States be awarded its costs and attorney's fees herein, and such  
2 other and further relief as this Court deems just and proper.

3 DATED this 12th day of August, 2022.

4 Respectfully submitted,

5 DAVID A. HUBBERT  
6 Deputy Assistant Attorney General

7 */s Dylan C. Cerling*  
8 DYLAN C. CERLING  
9 YEN JEANNETTE TRAN  
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14 *Attorneys for the United States of America*